



May 9, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Dominion Energy South Carolina, Incorporated's 2023 Avoided
Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)
Docket No. 2023-15-E

Dear Ms. Boyd:

On behalf of Dominion Energy South Carolina, Inc. ("DESC") and pursuant to Order No. 2022-312 issued by the Public Service Commission of South Carolina ("Commission") in the above-referenced docket, DESC submits the following questions to the Commission for its consideration as it conducts interviews of potential third-party consultants and experts.

1. Have you now or at any time represented or been retained to perform any services on behalf of any of the parties in Docket No. 2023-15-E, Docket No. 2021-88-E, or Docket No. 2019-184-E? If so, please identify the party that retained you and explain the purpose for which you were hired.
2. Have you now or at any time represented or been retained to perform any services against any of the parties in Docket No. 2023-15-E, Docket No. 2021-88-E, or Docket No. 2019-184-E? If so, please identify the party you opposed and explain the purpose for which you were hired.
3. Have you previously been engaged or retained by any state or federal regulatory commission to serve as an independent consultant or advisor under terms similar to the proposed engagement here? If so, please identify the proceeding, including the subject matter, and the terms of your engagements.

4. Have you previously testified in any proceeding before the Commission or any other state or federal commission? If so, please identify the proceeding, the party on whose behalf you testified, and the subject matter of your testimony. Also please note specifically if those proceedings involved testimony on PURPA and avoided costs.
 - a. London Economics International, you were selected as the Commission's advisor in the last avoided cost docket for DESC. In that docket, you staked out certain positions. What can you do to ensure us that you will look at this docket freshly and not be wedded to the positions or views that you developed in the prior avoided cost proceedings?
 - b. London Economics International, we understand that you employ a number of analytical tools in your professional services. How do you propose to employ those tools if you are engaged in this matter, and what advantage will that give you over the other bidder?
 - c. PA Consulting Group, we understand from your website that you describe your employees as "apply[ing] their ingenuity to deliver end-to-end innovation with our clients while creating a fairer society, positively impacting the environment and upholding the highest ethical standards." Do you believe that "creating a fairer society" or "positively impacting the environment" has any role in determining accurate "avoided costs" (as that term is defined in S.C. Code Ann. § 58-41-10(2)) and avoided cost rates that the electric utility offers to small power producers? If so, please explain.
5. For the work that you perform today, what percentage of your work is done on behalf of utilities? On behalf of consumer advocates? On behalf of solar developers and environmentalists? On behalf of other industry?
6. Do you have any experience in evaluating avoided cost methodologies and calculating avoided cost rates? If so, please explain.

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Thank you for allowing the parties to submit proposed questions and your consideration of this matter. If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,



Matthew W. Gissendanner

MWG/kms

cc: Andrew M. Bateman, Esquire
Carrie Grube Lybarker, Esquire
Roger P. Hall, Esquire

(all via electronic mail and First Class U.S. mail)